UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MDL No. 1456

Master File No. 01-CV-12257-PBS

Judge Patti B. Saris

AFFIDAVIT OF ARTHUR STEINBERG

I, Arthur Steinberg, pursuant to 28 U.S.C. §1746, on oath, depose and state as follows:

1. I am a resident of the Commonwealth of Pennsylvania. I have personal knowledge of the facts stated below and will testify in court to the same if called upon to do so.

1. I serve as the Lead Coordinator for the Philadelphia Federation of Teachers Health and Welfare Fund ("Health Fund").

2. I began discussing the possibility of the Health Fund becoming a plaintiff in this case with the attorneys for the plaintiffs in the fall of 2001.

3. During the course of this litigation I and various other members of the Health Fund have spent 63 hours working with attorneys for the plaintiffs to locate records, draft and edit affidavits, respond to discovery, prepare for and attend depositions, review pleadings and numerous other matters to assist in the prosecution of the case.
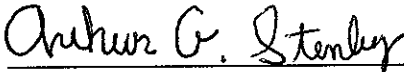
4. Reviewing records and claims data was extremely time consuming since most of the records were on paper and not available electronically.

5. In addition to time spent, the Health Fund also paid for supplies and copying costs incurred during the document review equaling Nine Hundred Eighty Dollars.($980.00)

6.   I did not make contemporaneous records of my time as an attorney would; however, I provided my best estimates of the time we expended.

I declare under penalty of perjury that the foregoing is true and correct.

Date: December 14, 2010

Arthur G. Steinberg
Arthur Steinberg

CERTIFICATE OF SERVICE

        I hereby certify that I, Steve W. Berman, an attorney, caused a true and correct copy of the foregoing, **DECLARATION OF ARTHUR STEINBERG**, to be delivered to all counsel of record by electronic service pursuant to Paragraph 11 of the Case Management Order No. 2, by sending on December 15, 2010, a copy to LEXISNexis File & Serve for posting and notification to all parties.

                                /s/ Steve W. Berman
                                Steve W. Berman